

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 1:25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida,

Defendants.

and

THE MICCOSUKEE TRIBE OF INDIANS,

Intervenors.

**PLAINTIFFS' PRELIMINARY WITNESS AND EXHIBIT LIST  
FOR AUGUST 6, 2025 HEARING**

Plaintiffs, through undersigned counsel, and in accordance with this Court's Omnibus Order (DE 73), hereby file their Preliminary Witness and Exhibit List for the August 6, 2025 Hearing. The witnesses and exhibits identified below are preliminarily designated and Plaintiffs reserve the ability to supplement this information in advance of the hearing:

**PRELIMINARY WITNESS LIST**

|    |   |
|----|---|
| 1  | Amber Crooks  |
| 2  | Tierra Curry  |
| 3  | Hon. Anna V. Eskamani   |
| 4  | Randy S. Kautz  |
| 5  | Christopher W. McVoy, Ph.D.   |
| 6  | Jessica Namath  |
| 7  | Dillon N. Reio, P.G.  |
| 8  | Eve Samples   |
| 9  | Representative of Intervenor/Plaintiff The Miccosukee Tribe of Indians        |
| 10 | Representative of Defendant Florida Division of Emergency Management          |
| 11 | Representative of Defendant U.S. Department of Homeland Security              |
| 12 | Representative of Defendant United States Immigration And Customs Enforcement |
| 13 | Representative of Defendant Miami-Dade County                                 |
| 14 | Any witnesses listed by Defendants  |

**PRELIMINARY EXHIBIT LIST**

|    |   |         |
|----|---|---------|
| 1  | Declaration of Eve Samples  | DE 5-1  |
| 2  | Declaration of Tierra Curry                                       | DE 5-2  |
| 3  | Declaration of Amber Crooks                                       | DE 5-3  |
| 4  | Declaration of Keith Pruett                                       | DE 16-1 |
| 5  | Declaration of Thomas P. Giles                                    | DE 21-1 |
| 6  | Declaration of David Richardson                                   | DE 21-2 |
| 7  | Florida Immigration Enforcement Operations Plan                   | DE 24-1 |
| 8  | Photos of Homeland Security Bus -AND- Border Patrol Van           | DE 24-2 |
| 9  | Memorandum of Agreement between DHS and FNG                       | DE 24-3 |
| 10 | Declaration of Betty Osceola                                      | DE 24-4 |
| 11 | Declaration of Ra Schooley and Laura Reynolds                     | DE 24-5 |
| 12 | Kristi Noem's July 2, 2025, Facebook post                         | DE 25-1 |
| 13 | Declaration of Ralph Arwood (with Report of Dr. Christopher McVoy | DE 26-1 |

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|    | attached)   |          |
| 14 | Declaration of Christopher W. McVoy, Ph.D.  | DE 27-1  |
| 15 | Villages Map  | DE 33-1  |
| 16 | Tribal Site Map   | DE 33-2  |
| 17 | Water Flow Map  | DE 33-3  |
| 18 | Declaration of Christopher W. McVoy, Ph.D.  | DE 49-1  |
| 19 | Declaration of Dr. Anna V. Eskamani   | DE 34-1  |
| 20 | Notice of Violations  | DE 38-1  |
| 21 | Report of Dr. Chris McVoy, Oblique Aerial Photos of Ongoing Construction at Dade Collier T&T Airport  | DE 38-3  |
| 22 | Report of Dr. Chris McVoy, Brief Analysis of Assertion of Pre-Existing Cement Pad Underlying Newly Asphalted Area at Jetport Site   | DE 38-4  |
| 23 | Dr. Chris McVoy, Curriculum Vitae   |          |
| 24 | TDF Waste Management Plan Overview  | DE 38-5  |
| 25 | Randy S. Kautz Panther Report   | DE 38-6  |
| 26 | Randy S. Kautz Curriculum Vitae   | DE 38-7  |
| 27 | Robert A. Frakes, Ph.D. Report  | DE 38-8  |
| 28 | Robert A. Frakes, Ph.D. Curriculum Vitae  | DE 38-9  |
| 29 | Florida Bonneted Bat Report   | DE 38-10 |
| 30 | Declaration of Jessica Namath -and- link to Ex A: <a href="https://coffey.sharefile.com/d-s295eefd36aa946d985e1c5abbf99edd3">https://coffey.sharefile.com/d-s295eefd36aa946d985e1c5abbf99edd3</a> | DE 47-1  |
| 31 | Declaration of Ian Gadea-Guidicelli   | DE 50-1  |
| 32 | Florida Emergency Management Executive Order Number 23-03   | DE 12-1  |
| 33 | MDAD arrival/departure spreadsheet  |          |
| 34 | WERP map  |          |
| 35 | Friends of the Everglades 2023.03.28 WERP comment letter  |          |
| 36 | Friends of the Everglades 2024.01.29 WERP comment letter  |          |
| 37 | Friends of the Everglades Newsletter signup   |          |
| 38 | Friends of the Everglades Your Moment of Everglades zen   |          |
| 39 | Dillon Reio, P.G. Resume  |          |
| 40 | Link to expert witness Dillon Reio materials: <a href="https://coffey.sharefile.com/d-s9969ac3d96ab43428ef9c28afbabc0f">https://coffey.sharefile.com/d-s9969ac3d96ab43428ef9c28afbabc0f</a>       |          |
| 41 | Longview International Deliverables page  |          |

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|----|--|---------|
| 42 | 2025.07.09 FDEM SERT Order no. PO-010326 (CN-310000-E6023)   |         |
| 43 | South Florida Detention Facility Continuity of Operations  |         |
| 44 | 2025.07.31 Declaration of Miranda Daviduk and Social Media Posts   |         |
| 45 | Excerpt of July 1 press conference (“Kristi Noem Sends Direct Message to Illegal Immigrants During Visit to Florida’s Alligator Alcatraz”) at <a href="https://www.youtube.com/watch?v=v9NV-XQb7QU">https://www.youtube.com/watch?v=v9NV-XQb7QU</a> (0:01 to 2:54) |         |
| 46 | Aircraft Flight Operations – Dade-Collier Training and Transition Airport  |         |
| 47 | 2025.06.23 DLC FDEM Letter Response Final  |         |
| 48 | 2025.07.07 DLC Letter to AG for Oversight & Compliance   |         |
| 49 | 2025.07.10 Letter to FL DEM for Oversight & Compliance   |         |
| 50 | BICY-Loop-Road-Scenic-Road-updated-2016-2  |         |
| 51 | FDEM DLC - LOI to Utilize TNT  |         |
| 52 | Letter of Intent to Purchase TNT   |         |
| 53 | Photo of equipment entering TNT site (IMG_4814)  |         |
| 54 | Photo of equipment entering TNT site (IMG_5145)  |         |
| 55 | Photo of equipment entering TNT site (7540)  |         |
| 56 | Photo of equipment entering TNT site (7538)  |         |
| 57 | Friends of the Everglades Annual Report  | DE 61-1 |
| 58 | Request for Immediate Access and Oversight Authority – Training and Transition Site  | DE 61-2 |
| 59 | Video clip of DHS vehicles at TNT site (IMG_7563)<br><a href="https://coffey.sharefile.com/d-s222b2dfe94a04b19bcde89715beb9ead">https://coffey.sharefile.com/d-s222b2dfe94a04b19bcde89715beb9ead</a>   |         |
| 60 | Video Clip: Todd Lyons, Face the Nation interview excerpt<br><a href="https://coffey.sharefile.com/d-sd1f6acb45cff4c7ba8f71e814c227eec">https://coffey.sharefile.com/d-sd1f6acb45cff4c7ba8f71e814c227eec</a>   |         |
| 61 | Video Clip: Garrett Ripa statement, July 25, 2025, press conference excerpt<br><a href="https://coffey.sharefile.com/d-s306c992fa37b420da48381459ab85da5">https://coffey.sharefile.com/d-s306c992fa37b420da48381459ab85da5</a>                                     |         |
| 62 | Video Clip: Ron DeSantis statement, June 27, 2025, press conference excerpt<br><a href="https://coffey.sharefile.com/d-sb9f599a84c294d16af10a77fbc09f6fb">https://coffey.sharefile.com/d-sb9f599a84c294d16af10a77fbc09f6fb</a>                                     |         |
| 63 | Video Clip: Kristi Noem statement, July 1, 2025, press conference excerpt<br><a href="https://coffey.sharefile.com/d-scb5747a8e9ef4d36aeefb207300b916e">https://coffey.sharefile.com/d-scb5747a8e9ef4d36aeefb207300b916e</a>                                       |         |
| 64 | Video Clip: Kristi Noem Fox News interview excerpt<br><a href="https://coffey.sharefile.com/d-s7eb198dddea54427aaa7e151fe72fa33">https://coffey.sharefile.com/d-s7eb198dddea54427aaa7e151fe72fa33</a>  |         |
| 65 | Video clip of DHS vehicles at TNT site (3184908626058178480)<br><a href="https://coffey.sharefile.com/d-s63f4a1ab16d445359673d981c7104311">https://coffey.sharefile.com/d-s63f4a1ab16d445359673d981c7104311</a>  |         |

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|----|--|---------|
| 66 | FDEM Letter of Intent to Purchase the Dade-Collier Training and Transition Airport (TNT)   | DE 12-3 |
| 67 | MDC Response to Letter of Intent for Purchase of TNT   | DE 12-4 |
| 68 | Notice of Intent to Utilize the Dade-Collier Training and Transition Airport   | DE 12-5 |
| 69 | MDC Mayor July 25, 2025 letter to Defendant Guthrie  | DE 61-2 |
| 70 | Link to expert witness Randy Kautz materials -- TK   |         |
| 71 | Big Cypress: A Look Inside   |         |
| 72 | Request for Monitoring Access to the Alligator Holding Facility (July 8, 2025)   |         |
| 73 | Request for Monitoring Access to the Alligator Holding Facility (July 10, 2025)  |         |
| 74 | CBS Miami Team, <i>Everglades "Alligator Alcatraz" immigrant detention center to receive first arrivals</i> , CBS News (July 2, 2025), <a href="https://www.cbsnews.com/miami/news/first-group-ofimmigrants-set-to-arrive-at-alligator-alcatraz-immigrant-detention-center-in-everglades/">https://www.cbsnews.com/miami/news/first-group-ofimmigrants-set-to-arrive-at-alligator-alcatraz-immigrant-detention-center-in-everglades/</a> . |         |
| 75 | All public records produced by FDEM in Response to Friends' June 23, 2025 Public Records Act   |         |
| 76 | Any and all documents identified by The Miccosukee Tribe of Indians  |         |
| 77 | Any and all documents identified as Exhibits by Defendants   |         |
| 78 | Any and all rebuttal and impeachment materials   |         |

Dated: August 1, 2025

Respectfully submitted,

EARTHJUSTICE  
4500 Biscayne Boulevard, Suite 201  
Miami, Florida 33137  
Telephone: (305) 440-5432

COFFEY BURLINGTON, P.L.  
2601 South Bayshore Drive, Penthouse One  
Miami, Florida 33133  
Telephone: (305) 858-2900

By: s/ Tania Galloni  
Tania Galloni, Fla. Bar No. 619221  
[tgalloni@earthjustice.org](mailto:tgalloni@earthjustice.org)  
Dominique Burkhardt, Fla. Bar No. 100309  
[dburkhardt@earthjustice.org](mailto:dburkhardt@earthjustice.org)  
Alisa Coe, Fla. Bar No. 10187  
[acoe@earthjustice.org](mailto:acoe@earthjustice.org)

By: s/ Paul J. Schwiep  
Paul J. Schwiep, Fla. Bar No. 823244  
[PSchwiep@CoffeyBurlington.com](mailto:PSchwiep@CoffeyBurlington.com)  
Scott Hiaasen, Fla. Bar No. 103318  
[SHiaasen@CoffeyBurlington.com](mailto:SHiaasen@CoffeyBurlington.com)  
[YVB@CoffeyBurlington.com](mailto:YVB@CoffeyBurlington.com)  
[LPerez@CoffeyBurlington.com](mailto:LPerez@CoffeyBurlington.com)  
[service@CoffeyBurlington.com](mailto:service@CoffeyBurlington.com)

*Counsel for Friends of the Everglades*

*Counsel for Plaintiffs*

CENTER FOR BIOLOGICAL DIVERSITY  
 Elise Pautler Bennett, Fla. Bar No. 106573  
[ebennett@biologicaldiversity.org](mailto:ebennett@biologicaldiversity.org)  
 Jason Alexander Totoiu, Fla. Bar No. 871931  
[jtotoiu@biologicaldiversity.org](mailto:jtotoiu@biologicaldiversity.org)  
 Post Office Box 2155  
 St. Petersburg, FL 33731  
 Telephone: (727) 755-6950

*Counsel for Center for Biological Diversity*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 1, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the Service List below via transmission of Notice of Electronic Filing generated by CM/ECF.

s/ Paul J. Schwiep

| Service List  |   |
|---|---|
| <b>Nathan A. Forrester</b><br>Chief Deputy Solicitor General<br><a href="mailto:nathan.forrester@myfloridalegal.com">nathan.forrester@myfloridalegal.com</a><br><b>Robert S. Schenck</b><br>Assistant Solicitor General<br><a href="mailto:robert.schenck@myfloridalegal.com">robert.schenck@myfloridalegal.com</a><br>Office of the Attorney General<br>The Capitol, PL-01<br>Tallahassee, Florida 32399-1050<br>Telephone: (850) 414-3300<br><a href="mailto:jenna.hodges@myfloridalegal.com">jenna.hodges@myfloridalegal.com</a><br><hr style="width: 20%; margin-left: 0;"/> Boies Schiller Flexner LLP<br><b>Jesse Panuccio, Esq.</b><br><a href="mailto:jpanuccio@bsflp.com">jpanuccio@bsflp.com</a><br><b>Evan Ezray, Esq.</b><br><a href="mailto:eezray@bsflp.com">eezray@bsflp.com</a> | HAYDEN P. O'BYRNE<br>United States Attorney<br><b>Carlos J. Raurell</b><br>Assistant U.S. Attorney<br><a href="mailto:carlos.raurell@usdoj.gov">carlos.raurell@usdoj.gov</a><br>99 Northeast 4 <sup>th</sup> Street<br>Miami, Florida 33132<br>Telephone: (305) 961-9243<br><a href="mailto:melissa.Jiminson@usdoj.gov">melissa.Jiminson@usdoj.gov</a><br><hr style="width: 20%; margin-left: 0;"/> ADAM R.F. GUSTAFSON<br>Acting Assistant Attorney General<br>Environment and Natural Resources Division<br>United States Department of Justice<br><b>Peter M. Torstensen, Jr.</b><br>Deputy Assistant Attorney General<br>Environment and Natural Resources Division |

|   |   |
|---|---|
| <p><b>David Costello, Esq.</b><br/> <a href="mailto:dcostello@bsflfp.com">dcostello@bsflfp.com</a><br/> 401 East Las Olas Boulevard, Suite 1200<br/> Fort Lauderdale, Florida 33301<br/> Telephone: (954) 356-0011<br/> <a href="mailto:jpanuccio@BSFLLP.com">jpanuccio@BSFLLP.com</a><br/> <a href="mailto:ftleserve@bsflfp.com">ftleserve@bsflfp.com</a></p> <p><i>Counsel for Defendant Kevin Guthrie, in his official capacity as Executive Director of the Florida Division of Emergency Management</i></p>  | <p>United States Department of Justice<br/> <b>Hayley A. Carpenter</b><br/> Trial Attorney<br/> <a href="mailto:hayley.carpenter@usdoj.gov">hayley.carpenter@usdoj.gov</a><br/> <b>Marissa Piropato</b><br/> Deputy Chief<br/> <a href="mailto:mairssa.piropato@usdoj.gov">mairssa.piropato@usdoj.gov</a><br/> Natural Resources Section<br/> Ben Franklin Station<br/> P.O. Box 7611<br/> Washington, D.C. 20044-7611<br/> Telephone: (202) 305-0242</p> <p><i>Counsel for Kristi Noem, in her official capacity as Secretary, United States Department of Homeland Security, and Todd Lyons, in his official capacity as Acting Director, United States Immigration and Customs Enforcement</i></p> |
| <p>GERALDINE BONZON-KEENAN<br/> Miami-Dade County Attorney<br/> <b>Christopher J. Wahl</b><br/> Assistant County Attorney<br/> <a href="mailto:wahl@miamidade.gov">wahl@miamidade.gov</a><br/> <b>Monica Rizo Perez</b><br/> Assistant County Attorney<br/> <a href="mailto:rizo@miamidade.gov">rizo@miamidade.gov</a><br/> <b>David M. Murry</b><br/> Assistant County Attorney<br/> <a href="mailto:DMMurray@FlyMIA.com">DMMurray@FlyMIA.com</a><br/> Stephen P. Clark County<br/> 111 Northwest 1<sup>st</sup> Street, Suite 2810<br/> Miami, Florida 33128<br/> Telephone: (305) 375-5151<br/> <a href="mailto:Victor.Rodriguez3@miamidade.gov">Victor.Rodriguez3@miamidade.gov</a><br/> <a href="mailto:Madalis.Gonzalez@miamidade.gov">Madalis.Gonzalez@miamidade.gov</a><br/> <a href="mailto:KGriffin@FlyMIA.com">KGriffin@FlyMIA.com</a></p> <p><i>Counsel for Miami-Dade County</i></p> | <p><b>Todd R. Friedman, Esq.</b><br/> <a href="mailto:todd@toddfriedmanpa.com">todd@toddfriedmanpa.com</a><br/> TODD R. FRIEDMAN, P.A.<br/> 1101 Brickell Avenue<br/> Suite S-700<br/> Miami, Florida 33131<br/> Telephone: (786) 536-7190</p> <p><i>Counsel for The Miccosukee Tribe of Indians</i></p>  |